

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
New Hope Oil Dump - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region IV

Subject: POLREP #2
Identification of Spilled Material as Sewage
New Hope Oil Dump

New Hope, TN
Latitude: 35.0077740 Longitude: -85.6579080

To: James Webster, USEPA R4 ERRPPB
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From: Matthew Huyser, FOSC
Date: 7/14/2020
Reporting Period: 7/11/2020 - 7/12/2020

1. Introduction

1.1 Background

Site Number:	C4F3	Contract Number:	
D.O. Number:		Action Memo Date:	
Response Authority:	CERCLA	Response Type:	Emergency
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	7/9/2020	Start Date:	7/9/2020
Demob Date:	7/12/2020	Completion Date:	
CERCLIS ID:	TNN000420074	RCRIS ID:	
ERNS No.:		State Notification:	7/9/2020
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Emergency Response

1.1.2 Site Description

The New Hope City Park is located behind the New Hope Volunteer Fire Department building and consists of a baseball field and picnic building with pavilion, kitchen, and bathrooms. The park is surrounded by residential lots on the south and east side, a wooded pond on the west side and wooded area on the north side with residences in the next lot.

1.1.2.1 Location

New Hope City Park
2615 TN-156, New Hope, Marion County, Tennessee

1.1.2.2 Description of Threat

Dumped grease, animal fat or used cooking oil OR sewage discharge in public park. Has impacted adjacent waterways and residential property.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

See POLREP #1 for Preliminary Site Inspection Results

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

On the morning of 7/11/2020, the On-Scene Coordinator (FOSC) directed EPA's Emergency Rapid Response Services (ERRS) contractor to continue the recovery of discernible grease and sludge, with oil characteristics, and to consolidate the sludge and water by building or pushing impacted soil into berms. Additional objectives included removing water from the sump and the adjacent hole near the park building as well as constructing a filter barrier at the outfall of the pond where it flows to the ditch that drains under TN-156. Verbal access was granted from both property owners near the pond to construct the berm as well as from the property owner on the south side of TN-156. The OSC determined that the outfall of the pond was the best place to construct the filter barrier since the pond would provide a greater amount of storage than the ditch if there was a slight backup caused by the barrier.

The OSC directed EPA's Superfund Technical Assessment and Response Team (START) contractor to collect additional sludge samples for fecal coliform analyses and transport the samples to the laboratory.

By midday on 7/11/2020, the Tennessee Department of Environment and Conservation (TDEC) contacted The OSC and reported that the analysis for E. coli for the water collected near the berm was inconclusive due to the dark color of the water interfering with the colorimetric results of the analysis.

The OSC inspected the ditch downstream from the property near TN-156 and upstream from Short Hollow Road. No water was found in the ditch, and there was no distinct channel that could be identified - the ditch area flattened into a field. Dead vegetation was found approximately 20 to 50 feet wide and 100 feet long in the area where drainage from the ditch would enter after crossing the property line. No distinct sign of oil or sludge was observed.

On the morning of 7/11/2020, ERRS removed water from the sump but was unable to remove water from the adjacent hole due to consistent recharge. The OSC inspected the sump but found no clear evidence of damage or malfunction. Photographs were sent to the supervisor at Marion Gas Systems Board of Waterworks & Sewers, who, upon reviewing them, concurred that no damage or malfunction was visible. The hole adjacent to the sump was observed to be directly above the effluent line to the sanitary sewer, and it was suspected that a break in that line would have caused the hole and the resulting spill in the park. The OSC elected not to excavate the hole or the sump as a precaution; excavation work would risk damaging the line which would invalidate evidence that a break in the line was the original cause of the spill

The OSC re-excavated a segment of the sewer line near the baseball field where the line had been cut and capped by Marion County on 7/7/2020. The cap to the line that led to the park building's sump was removed and ERRS installed a PVC elbow, a pressure gauge, and a hose fitting. Using an air-powered, double-diaphragm pump, ERRS pumped 55 gallons of water with green fluorescent leak detection dye into the sewer line. A gauge was manually monitored to ensure that excessive pressure was not introduced to the line. After pumping was initiated, water was observed flowing out of the hole near the sump, and soon thereafter, the dyed water was observed in the hole near the sump. The pressure during the operation did not exceed 5 pounds per square inch (psi) and generally did not exceed 0 psi throughout the operation. A break in the sewer line outside the sump was, therefore, determined to be the cause of the hole and the source of the spill at New Hope City Park. The sewer line is connected to the positive pressure main on TN-156, which is suspected of having back flowed into the sewer line towards New Hope City Park once the break occurred.

When the source of the spill was determined to have been sewage, The OSC directed ERRS to conclude response operations and prepare to demobilize (7/12/2020.) The START demobilized on 7/11/2020. The OSC notified the City of New Hope, Marion Gas Systems Board of Waterworks & Sewers, and TDEC of the findings. Preliminary arrangements were made with Marion County to allow the water and sludge that had been stored in the frac tank to be disposed of at the POTW without additional analytical data for waste characterization.

2.1.2 Response Actions to Date

- Collected analytical samples of water, discernible grease, sludge and soil
- Constructed barriers at outfall from park and pond to prevent further migration of oil downstream
- Initiated removal and storage of grease and sludge
- Initiated excavation and consolidation of sludge and water
- Completed investigation of spill source and concluded source to be a sewer line break.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

An access agreement was provided to the City of New Hope to conduct the work on New Hope City Park. Verbal access was granted to initiate the work.

2.1.4 Progress Metrics

A vacuum truck was used to move discernible grease and sludge to a frac tank. No soil was stockpiled for disposal, but soil that was excavated to consolidate and berm sludge and water was left in place

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Sewage	Frac Tank	19,000 gal			South Pittsburg POTW (planned)

2.2 Planning Section

2.2.1 Anticipated Activities

No further response activities will take place. ERRS will make arrangements with Marion County to dispose of the material from the frac tank to the POTW in South Pittsburg, TN.

2.2.1.1 Planned Response Activities

- Mitigate the threat of contamination downstream (COMPLETE)
- Recover and dispose of grease and oils which can be distinguished from other materials (ceased)
- Collect samples for laboratory analysis to determine the contents and composition of the spilled materials (COMPLETE)
- Conduct investigation to determine the spill source including interviews and collection of documentation (COMPLETE)

- Excavate and dispose of impacted soil (ceased)

2.2.1.2 Next Steps

- Disposal of wastewater will take place during the week of July 13, followed by the removal of the frac tank from New Hope City Park. Mobilization of the FOSC is not necessary for this operation, but the activity will be overseen by a foreman with ERRS.

2.2.2 Issues

The OSC spoke with six residents and community members regarding observations of odors and water from the park (property owners who lived adjacent to the park and community members who lived nearby.) All accounts of the odor indicate that it had been present for at least a month, four of the six stated the strong odor had been present for more than two months, and three of the six stated that they began noticing the odor four months ago or longer. All six residents stated that they had noticed stagnant water smells from the park in previous years, but the odor this year was significantly different. Two of the residents stated that the water in the ditch had become darker and more odorous over the previous week.

All residents and local representatives stated that the park floods frequently and is usually flooded for an extended period of time during the spring and early summer.

2.3 Logistics Section

There is no information to report in this section.

2.4 Finance Section

2.4.1 Narrative

The initial deployment on 7/9/2020 was for a response to animal fat or used cooking oil that had been allegedly discharged from a truck at New Hope City Park. Federal Project Number (FPN) E20417 was opened with the National Pollution Fund Center (NPFC) with an initial amount of \$50,000 to respond to the discharge. An EPA Site identification (ID) number V4GQ was opened for the response.

Upon the development, a strong suspicion beginning 7/10/2020 that the release was the result of mixed waste or perhaps sewage, a Comprehensive Response Compensation and Liability Act (CERCLA) Site ID of C4F3 with an EPA ID of TNN000420074 was opened.

ERRS and START were mobilized to the response under The OSC's warrant authority, which will be documented in an Emergency Response Action Memorandum. Budgeted costs for each contractor do not represent the total obligation available, and estimated costs do not represent actual expenditures for the time period.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$50,000.00	\$36,000.00	\$14,000.00	28.00%
TAT/START	\$10,000.00	\$3,000.00	\$7,000.00	70.00%
Intramural Costs				
Total Site Costs	\$60,000.00	\$39,000.00	\$21,000.00	35.00%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

The EPA Region 4 Superfund and Emergency Management Division (SEMD) COVID-19 Safety Best Practices and SEMD COVID_19 Activity Hazard Analysis have been reviewed and implemented at the response. ERRS will include the best practices document as an attachment to its Health and Safety Plan.

2.5.2 Liaison Officer

There is no information to report in this section.

2.5.3 Information Officer

There is no information to report in this section.

3. Participating Entities

3.1 Unified Command

EPA is responded with assistance and consultation from TDEC, Marion County, and the City of New Hope. However, no Unified Command was established.

3.2 Cooperating Agencies

City of New Hope

Marion Gas Systems Board of Waterworks & Sewers

Tennessee Department of Environment and Conservation

4. Personnel On Site

EPA (1) - demobilized 7/12/2020
ERRS (9) - demobilized 7/12/2020
START (1) - demobilized 7/11/2020
TDEC (1-2) - demobilized 7/11/2020
City of New Hope (1) - local
Marion County (1-2) - local

5. Definition of Terms

The term "discernible grease" is used in the POLREP to distinguish between material that is confidently known to be grease by its physical characteristics at the Site, from material that may or may not be grease which has been weathered or mixed with other materials.

6. Additional sources of information

6.1 Internet location of additional information/report

There is no information to provide in this section

6.2 Reporting Schedule

A final POLREP will be generated after disposal is complete.

7. Situational Reference Materials

There is no information to report in this section